

EPA Region 10

Responsiveness Summary from Public Input on September 2012 document

“Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley, WA”

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February 28, 2013

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13. Bacterial

14. Peer Review

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14. Peer Review

Several commenters indicated the peer review conducted for the report was inadequate because: EPA did not follow its own peer review guidance; that the report was classified as “influential” by OMB and required more extensive review; EPA’s selection of peer reviewers was not transparent and all four peer reviewers were from federal agencies; with the exception of one reviewer the comments received were brief and not adequately rigorous; and one peer reviewer stated that the nitrate in many of the wells is most likely from a mix of sources which would be challenging to tease apart, probably requiring a much more extensive sampling campaign and more knowledge of well depth and screen lengths.

EPA’s response: EPA decided that the document did not require peer review according to the peer review guidelines available in November 2011 and classified the report as “Other” using the OMB work product classification criteria. Although EPA determined at the time it did not need to conduct a formal peer review it did decide to conduct an independent third party review using scientists from the Federal government. EPA asked scientists from USGS, USDA, EPA’s ORD, and EPA regional scientists to review the document. EPA received comments on the draft report and incorporated those into the document. EPA provided sufficient time to reviewers and their comments reflect their ~~judgement~~ judgment on the report. EPA did consider the comments of all reviewers and they helped EPA draw its conclusions including indicating the limitations and uncertainties in the study.

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